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*Co-Lead Counsel for the Ignition Switch
Plaintiffs and Certain Non-Ignition Switch
Plaintiffs in the MDL Court*

*Designated Counsel for the Ignition
Switch Plaintiffs and Certain Non-
Ignition Switch Plaintiffs in the
Bankruptcy Court*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re:	: Chapter 11
	: :
MOTORS LIQUIDATION COMPANY, <i>et al.</i> ,	: Case No.: 09-50026 (MG)
f/k/a General Motors Corp., <i>et al.</i> ,	: :
	: :
Debtors.	: (Jointly Administered)
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**APPELLEE IGNITION-SWITCH PLAINTIFFS'
AND CERTAIN NON-IGNITION SWITCH PLAINTIFFS'
DESIGNATION OF ITEMS TO BE INCLUDED IN THE RECORD ON APPEAL**

Pursuant to Rule 8009(a) of the Federal Rules of Bankruptcy Procedure, the Ignition Switch Plaintiffs and certain Non-Ignition Switch Plaintiffs (the “Appellees”), by and through their undersigned counsel, respectfully designate the following additional items for inclusion in the record on appeal in connection with appeal by General Motors LLC (“New GM”) from (i) the *Memorandum Opinion and Order Granting in Part New GM’s Motion to Enforce Sale Order Against the Pitterman Plaintiffs and Resolving 2016 Threshold Issue Two: Whether Non-Ignition*

Switch Plaintiffs are Barred From Asserting Independent Claims Against New GM, entered by the United States Bankruptcy Court for the Southern District of New York (“Bankruptcy Court”) in the above-referenced case on June 7, 2017 [Dkt. No. 13955]; and (ii) the *Order Granting in Part and Denying in Part General Motors LLC’s Motion to Enforce the Ruling in the Bankruptcy Court’s June 7, 2017 Opinion With Respect to the Pitterman Plaintiffs*, entered by the Bankruptcy Court on July 10, 2017 [Dkt. No. 13991].

DESIGNATION OF ADDITIONAL ITEMS FOR THE RECORD ON APPEAL

Appellees designate each of the following documents from the above-captioned case for inclusion in the record on appeal.

	Date Filed	ECF No.	Description
1.	9/15/2014	12897	Scheduling Order Regarding Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce This Court’s July 5, 2009 Sale Order and Injunction Against Plaintiffs in Pre-Closing Accident Lawsuits
2.	9/15/2014	12898	Scheduling Order Regarding Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court’s July 5, 2009 Sale Order and Injunction (Monetary Relief Actions, Other than Ignition Switch Actions)
3.	6/15/2015	13207	Elliot Plaintiffs/Appellants’ Statement of the Issues and Designation of Items to be Included in the Record on Appeal
4.	7/14/2015	13299	Appellants’ Corrected Statement of Issues on Appeal and Amended Designation of Items to be Included in the Record on Appeal
5.	6/1/2016	13634	Motion to Authorize Notice of Motion by General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Bankruptcy Court’s July 5, 2009 Sale Order and Injunction, and the Rulings in Connection Therewith
6.	6/20/2016	13642	Objection by State Court Plaintiffs to Motion by General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Bankruptcy Court’s July 5, 2009 Order and Injunction, and the Ruling in Connection Therewith

Dated: August 22, 2017
New York, New York

Respectfully submitted,

BROWN RUDNICK LLP

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